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UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

EUGENE DIVISION

NICHOLAS JAMES MCGUFFIN, as an  
individual and as guardian *ad litem*, on behalf  
of S.M., a minor,

Case No. 6:20-CV-01163-MK

Plaintiffs,

v.

MARK DANNELES, PAT DOWNING,  
SUSAN HORMANN, MARY KRINGS,  
KRIS KARCHER, SHELLY MCINNES,  
RAYMOND MCNEELY, KIP OSWALD,  
MICHAEL REAVES, JOHN RIDDLE,  
SEAN SANBORN, ERIC  
SCHWENNINGER, RICHARD WALTER,  
CHRIS WEBLEY, ANTHONY WETMORE,  
KATHY WILCOX, CRAIG ZANNI, DAVID  
ZAVALA, JOEL D. SHAPIRO AS  
ADMISINISTRATOR OF THE ESTATE OF  
DAVID E. HALL, VIDOCQ SOCIETY,  
CITY OF COQUILLE, CITY OF COOS  
BAY, and COOS COUNTY,

Defendants.

**DECLARATION OF REBECCA  
CAMBRELENG IN SUPPORT OF  
MOTION TO QUASH SUBPOENA, OR  
IN THE ALTERNATIVE, MOTION TO  
GRANT PROTECTIVE ORDER**

I, Rebecca Cambreleng, declare under penalty of perjury, the following:

1. I am the attorney for Gabriella Cato in the above-captioned matter. I have personal knowledge of the facts set forth below and make this declaration in support of the Motion to Quash Subpoena, or in the Alternative, Motion to Grant Protective Order, filed herewith.

2. I have conferred with counsel for Plaintiffs, Andrew Lauersdorf, and counsel for Defendants, Robert Franz Jr., regarding this motion. Plaintiffs oppose this motion; Defendants do not oppose this motion.

3. Attached as Exhibit 1 is a true and accurate copy of the Subpoena to Testify at Deposition, which was personally served on Ms. Cato on July 6, 2023.

4. Attached as Exhibit 2 is a true and accurate copy of Ms. Cato's Supplemental First Amended Complaint filed against Fisher Golf Group LLC, and individual defendants, Clackamas County Case No. 22CV07337 ("Retaliation Matter").

5. I represented Ms. Cato in the Retaliation Matter. This case settled in July of 2022. As part of that settlement, Ms. Cato signed a settlement agreement containing the following provision:

"At Plaintiff's request, the Parties agree that the Settlement Payment shall be confidential and, other than for the purpose of enforcing any provision of this Agreement, shall not be disclosed to anyone, except Fisher Golf may disclose the terms of this agreement to employees with a business need to know and the Parties may disclose the terms of this Agreement to their own spouse, attorney, accountant, tax advisor, the Internal Revenue Service, or as otherwise required by law ("Third Parties"), provided the Third Parties to whom such disclosure is made shall agree to be bound by these confidentiality terms."

6. Attached as Exhibit 3 is a true and accurate copy of the transcript of Ms. Cato's deposition, taken on July 6, 2023.

7. On July 6, 2023, Ms. Cato retained my services in relation to the instant lawsuit.

8. Attached as Exhibit 4 is a true and accurate copy of an email sent from Andrew Lauersdorf to myself on July 11, 2023.

9. On July 18, 2023, during a phone conversation between Mr. Lauersdorf and myself, Mr. Lauersdorf stated that he believed Ms. Cato, and by extension myself, had been untruthful in the Retaliation Matter when it came to claims regarding Mr. McGuffin.

I HEREBY DECLARE THAT THE ABOVE STATEMENTS ARE TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND THEY ARE MADE FOR USE AS EVIDENCE IN COURT AND ARE SUBJECT TO PENALTY FOR PERJURY.

Dated this 20th day of July, 2023.

/s/ Rebecca Cambreleng

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## CERTIFICATE OF SERVICE

I certify that on the date listed below, I served the foregoing **DECLARATION OF REBECCA CAMBRELENG IN SUPPORT OF MOTION TO QUASH SUBPOENA, OR IN THE ALTERNATIVE, MOTION TO GRANT PROTECTIVE ORDER** upon the following attorneys and designated recipients for plaintiffs and defendants listed below via electronic means through the Court's Case Management/Electronic Case File system:

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DATED July 20, 2023.

**CAMBRELENG & MARTON LLC**

By: *s/ Maxwell Joyner*

Max Joyner, Paralegal